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10 **UNITED STATES FEDERAL DISTRICT COURT**
11
12 **FOR THE DISTRICT OF NEVADA - NORTHERN DIVISION**

13 RALPH STEPHEN COPPOLA; DOES I to
14 XX,

15 Plaintiffs,

16 vs.

17 DARREN K. PROULX; LAND RESOURCE
18 INVESTMENTS, INC., LAND RESOURCE
19 MANAGEMENT, INC.; MARINA
20 COMMERCIAL OFFICES, LLC; and DOES I
21 to XX,

22 Defendants.

23 Case No. 3:2011-CV-00074

24 ANSWER OF DEFENDANTS DARREN
25 K. PROULX, LAND RESOURCE
26 INVESTMENTS, INC., LAND
27 RESOURCE MANAGEMENT, INC. and
28 MARINA COMMERCIAL OFFICES,
LLC

29 COME NOW, Defendants DARREN K. PROULX, LAND RESOURCE INVESTMENTS,
30 INC., LAND RESOURCE MANAGEMENT, INC., MARINA COMMERCIAL OFFICES,
31 LLC, by and through their counsel of record, Alessi & Koenig, LLC, and hereby answer
32 Plaintiff's First Amended Complaint as follows:

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- 34 • Answering Paragraphs 1, 2, 5, 6, 7, 8, 16, 17, 18, 30, 35, 36, 39, 41, 46, 47, 48, 59, 60,
35 61, 62, 63, and 97 of the Complaint, Defendants admit the allegations contained therein.
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 - 37 • Answering Paragraphs 3, 4, 9, 10, 11, 12, 13, 15, 21, 22, 24, 25, 26, 27, 28, 29, 32, 33,
38 34, 37, 38, 40, 42, 49, 52, 53, 54, 56, 58, 64, 65, 66, 67, 69, 72, 75, 79, 82, 88, 161, and

162 of the Complaint, Defendants lack sufficient information or belief to admit or deny
the allegations contained therein and, on that basis, specifically and generally deny said
allegations.

- Answering Paragraphs 14, 19, 20, 23, 31, 43, 44, 45, 50, 51, 55, 57, 68, 70, 71, 73, 74,
76, 77, 78, 80, 81, 83, 84, 85, 86, 87, 89, 90, 91, 92, 93, 94, 95, 96, 98, 99, 101, 102, 104,
105, 107, 108, 110, 111, 113, 114, 116, 117, 119, 120, 122, 123, 124, 125, 126, 127, 128,
130, 131, 132, 133, 135, 136, 137, 138, 139, 140, 141, 143, 144, 145, 146, 148, 149, 150,
152, 153, 155, 156, 158, 159, 163, 164, 166, 167, 168, 169, 171, 172, 174, 175, 177, 178,
179, 180, 182, 183, 185, 186, 188, 189, 190, 192, 193, 194, 195, 197, 198, 199, 200, 202,
203, 204, 205, 207, 208, 210, 211, 213, 214, 216, 217, 219, 220, 221, 222, 224, 225, 226,
227, 229, 230, 231, 233, 234, 235, 237, 238, 240, 241, 243, 244, 246, 247, 249, 250, 252,
253, 255, 256, 258, 259, 261, 262, 264, 265, 267, 268, 270, and 271 of the Complaint,
Defendants deny the allegations contained therein.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

- Plaintiff's Complaint fails to state claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

- Plaintiff's claims are brought in violation of the Rules of Professional Conduct.

THIRD AFFIRMATIVE DEFENSE

- This Court lacks subject matter jurisdiction to adjudicate Plaintiff's claims.

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2 **FOURTH AFFIRMATIVE DEFENSE**

- 3 • Subject to discovery, Plaintiff's claims are barred by doctrine of unclean hands.
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5 **FIFTH AFFIRMATIVE DEFENSE**

- 6 • Plaintiff's claims are barred by laches and/or statutes of limitations.
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8 **SIXTH AFFIRMATIVE DEFENSE**

- 9 • Plaintiff's claims are barred because Plaintiff has incurred no damages.
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11 **SEVENTH AFFIRMATIVE DEFENSE**

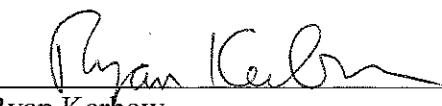
- 12 • Plaintiff's claims are barred because of waiver, acquiescence and/or estoppel.
- 13

14 **PRAYER FOR RELIEF**

15 WHEREFORE, Defendants pray Plaintiff take nothing by way of his complaint and for an
16 award of fees and costs and any other relief this Court finds just and proper.
17

18 DATED: June 6, 2011

19 Respectfully submitted,

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24 _____
25 Ryan Kerbow
26 Attorney for Defendants
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CERTIFICATE OF MAILING

I hereby certify that on this 6th day of June, 2011, I deposited the foregoing ANSWER into the US Mail, postage prepaid, addressed to:

Ralph Stephen Coppola
4785 Rio Pinar Drive
Reno, NV 89509


An employee of Alessi & Koenig